

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as  
President of the United States, et al.,

Defendants.

Case No. 25-cv-11221

**DECLARATION OF TURNER SMITH**

I, Turner Smith, am an attorney admitted to practice before this Court, do hereby state the following under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am an Assistant Attorney General and Deputy Chief of the Energy and Environment Bureau in the Office of the Attorney General for the Commonwealth of Massachusetts, and I appear on behalf of the Plaintiffs in this action.

2. I submit this declaration in support of Plaintiff States' Motion for a Preliminary Injunction, pursuant to Federal Rule of Civil Procedure 65.

3. The facts set forth herein are based upon my personal knowledge or a review of the files in my possession.

4. I have attached to this declaration true and correct copies of publicly promulgated or issued documents and factual declarations, as follows:

5. Attached hereto as Exhibit 1 is the declaration of Jonathan Binder of New York.

6. Attached hereto as Exhibit 2 is the declaration of Dr. Alison Brizius of Massachusetts.

7. Attached hereto as Exhibit 3 is the declaration of Megan Brunatti of New Jersey.
8. Attached hereto as Exhibit 4 is the declaration of Dan Burgess of Maine.
9. Attached hereto as Exhibit 5 is the declaration of Bruce K. Carlisle of Massachusetts.
10. Attached hereto as Exhibit 6 is the declaration of Katherine S. Dykes of Connecticut.
11. Attached hereto as Exhibit 7 is the declaration of Stephen Gawlick of New York.
12. Attached hereto as Exhibit 8 is the declaration of Brian P. Granahan of Illinois.
13. Attached hereto as Exhibit 9 is the declaration of Christopher R. Hoagland of Maryland.
14. Attached hereto as Exhibit 10 is the declaration of Christopher Kearns of Rhode Island.
15. Attached hereto as Exhibit 11 is the declaration of Elizabeth Mahony of Massachusetts.
16. Attached hereto as Exhibit 12 is the declaration of Katharine Perry of New Jersey.
17. Attached hereto as Exhibit 13 is the declaration of Paul G. Pinsky of Maryland.
18. Attached hereto as Exhibit 14 is the declaration of John Williams of New York.
19. Attached hereto as Exhibit 15 is the declaration of Dr. Pete Wyckoff of Minnesota.
20. Attached hereto as Exhibit 16 is the declaration of Denise Barton of Massachusetts.
21. Attached hereto as Exhibit 17 is the Presidential Memorandum entitled *Temporary Withdrawal of All Areas on the Outer Continental Shelf from Offshore Wind Leasing and Review of the Federal Government's Leasing and Permitting Practices for Wind Projects*, 90 Fed. Reg. 8363 (Jan. 29, 2025).

Dated: May 12, 2025

Boston, Massachusetts

/s/ Turner Helen Smith

Turner Smith, BBO No. 684750

Assistant Attorney General and Deputy Chief

Energy and Environment Bureau

Office of the Attorney General

Commonwealth of Massachusetts